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			Date: March 2014 *MNR 4*	*Date: June 2015*	*Date: August 2015*	*Date: September 2016*	
MNRF-4	Hydrology (Seine River water taking)	Hydrology TSD_V2 Page 1 EIS/EA §6.1.3.1.3, §8.2.2	The EA has not identified how Marmion lake levels can be addressed without impacting existing environmental, social and economic objectives and commitments. The TSD states that a model to estimate inflows because of the "high percentage (34%) of missing days in the record of outflow from Raft Lake". Between 2001 and 2012, only 36 days are missing which is only 0.9%. Using actual data would have eliminated the high percent differences shown between the actual and synthesized data as shown in Table 3. Water levels in the Marmion reservoir are critical to fish habitat which support an active recreational and commercial tourism fishery, support existing hydroelectric generation facilities downstream and support recreational and tourist industry navigation through the Marmion sluiceway which is also critical to the local angling tournament which is very important to the economy and culture of Atikokan. The EIS document states that that changes in Marmion lake levels can be addressed within the bounds of the Seine River Water Management Plan (SRWMP) but the EIS document has not indicated how they can be addressed without impacting existing environmental, social and economic objectives. The response to previous concerns (eg *MNR-6, MNR-251, MNR-266*) about water levels both in Marmion and downstream indicate no impact but the EIS has not provided information on how responses to predicted declines in water levels (up to 9cm) can be addressed without sacrificing existing objectives and demands from existing social economic uses and environmental needs. In the EIS document, it repeatedly states that impacts are restricted to the mine site (part of the no significant changes to bio-physical resource) but it fails to adequately explain how water level impacts will not extend	Canadian Malartic understands that the Marmion Reservoir is regulated and managed subject to the Seine River Watershed Management Plan. The predicted effects to water levels and outflows are not considered significant. The maximum predicted water level reduction of 9 cm is considered to be an extreme upper bound' scenario, as predicted by a single year model. The continuous year modelling (which considers management of water levels and outflows in accordance with the Seine River Watershed Management Plan) predicted a one-time maximum reduction of 6.8 cm over the 27 year modelling period, and an average annual maximum reduction of 4.4 cm (which would occur in the winter). Predicted reduction in water levels at the time of the Atikokan Bass Classic ranged from 0 to 2.8 cm. The Seine River Water Management Plan allows for water level fluctuations of greater than 2 m. The average reduction of 4.4 cm due to the Project equals a change of 2% within the existing water level range. Canadian Malartic does not control the Raft Lake Dam and therefore cannot directly control or manage the potential changes imposed by the Project on reservoir water levels or outflows. However, Canadian Malartic is committed to fully participating in the Seine River Watershed Committee, by sharing information on Project water requirements and use. Canadian Malartic understands that the Hammond Reef Gold Project will be subject to the conditions of a Permit to	MNRF has identified there is high potential for significant effects from the water level reduction. A 9 cm draw can have significant impacts to the environment (fish habitat), recreational uses and tourism (navigation and fish health) and economic impacts water power stakeholders (water power generation). MNRF does not find the response has addressed the issues. The lack of control over the Raft Lake Dam is not relevant. The SRWMP is a water management plan between the province and the water power proponents. The plan sets out water levels management objectives such as operation and minimum flow requirements that are legally binding to the signatures. CMC will be included as other users on the system in participating in the WMP development. But this alone does not provide a solution in addressing potential	As stated in previous responses, the maximum predicted water level reduction of 9 cm is considered to be an extreme upper bound for potential project impacts. It is based on several conservative assumptions and does not consider adaptive management of the Raft Lake Dam to accommodate project withdrawal or project contingency measures during low flow and water level conditions. A 9 cm reduction in water level is not expected to occur. Positive discussions have been held between CMC and the downstream hydropower operators. n agreement has been reached in principle and negotiations and the development of formal agreements with the waterpower operators are in progress. The agreements will consist of a water management, communication and operating framework technical agreement between CMC and both power operators and separate compensation agreements with each individual power operator. Additionally, CMC has developed contingency water management plans that demonstrate that the project can be operated during low flow and water level conditions while imposing no net withdrawal of water from the Marmion Reservoir. Details on the proposed low flow and water level contingency measures are provided in the attached memorandum. Through regular communication with the hydropower operators that control the Raft Lake Dam, ongoing adaptive management of water levels at the Raft Lake Dam and implementation of project contingency measures during low flow and water level conditions, the project is not expected to impose impacts on water levels such that the annual water level fluctuations extend beyond their normal operating range. **Attachment**: Technical Memorandum: Contingency Measures to Eliminate Water Taking from Marmion Reservoir during Low Water Level and Outflow Periods at Raft Lake Dam - Hammond Reef Gold Project	MNRF-4B

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			downstream from Marmion Reservoir in low water conditions. We have initiated discussions with MOE on how these concerns could be addressed in the permitting process (e.g., conditions around no approval to take water when levels are below SRWMP levels in MOE's Permit to Take Water). Previous low water years (i.e., 2010) have presented issues with operations of the sluiceway. Bad timing can have economic impacts (i.e., the bass tournament, tourist industry). The EA needs to identify there can be potential impacts from the mine project, with regards to fluctuating water levels such as this. We have yet to see the analysis of what would have happened if the mine had been operating during a drought year such as 2010 and how that would have affected achievement water levels management objectives such as operation of the sluiceway and minimum flow requirements as discussed with MNR and dam operators.	Take Water, issued by MOE, and will comply with the conditions of that permit.	impacts. It needs to be addressed in the EA. The EA needs to better demonstrate contingency plans and measures that will be in place in the event water levels in the Marmion Lake reservoir are such that water cannot be taken (i.e. in drought situations where water levels are below the rule curve, such as in 2010). The response provided by the proponent is not satisfactory because it did not reflect 2010 data which would have provided a better portrayal of the potential effects and a realistic scenario of effects. MNRF suggests that the proponent meet with the stakeholders to develop a Memorandum of Agreement. MNRF also has some concerns with a recent response to letters of the two water power proponents. From this response provided, it would appear there is a need for a new water balance plan in the EA. The response also includes reference to operational measures to		

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					include on-site water storage area. MNRF requests a better description of where the storage site is, how much they will store, and how it will be effective as a contingency plan, and the predicted term of effectiveness. * Any new or contingent water sources additional to this EA, will need to have independent review and assessment		